

Steven J. German - State Bar No. 014789
Scott B. Seymann – State Bar No. 027215
ADELMAN GERMAN, P.L.C.
8245 North 85th Way
Scottsdale, Arizona 85258
Telephone (480) 607-9166
Facsimile (480) 607-9031
steve@adelmangerman.com

*Additional Attorneys for Plaintiff
Appear on Signature Line*

Damian Richard – State Bar No. 028477
Bryan Shartle – La. Bar. No. 27640
Spencer Schulz – La. Bar No. 33361
SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.
1545 Hotel Circle South, Suite 150
San Diego, CA 92108-3426
Tel: 619/758-1891
Fax: 619/296-2013
drichard@sessions.legal

Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

CYNTHIA ZADEL individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GLOBAL RECEIVABLES
SOLUTIONS, INC., a Delaware
corporation and ALORICA, INC., a
California corporation,

Defendants.

Case No. 2:16-cv-00850-JWS

STIPULATION OF DISMISSAL

Plaintiff Cynthia Zadel (“Plaintiff” or Zadel”) and Defendants Global Receivables
Solutions, Inc. (“GRS”) and Alorica, Inc. (“Alorica”), through their counsel, stipulate as follows:

1 1. Plaintiff filed this putative class action against Defendants.

2 2. Plaintiff has agreed to dismiss with prejudice her individual claims against
3 Defendants.

4 3. The dismissal of this case is without prejudice as to all putative, unidentified class
5 members, if any.

6 4. Fed. R. Civ. P. 41(a)(1)(A)(ii) allows the parties to stipulate to the dismissal of an
7 action at any time. Rule 23(e) does not limit the right to stipulate to dismissal of this action
8 because it only applies to certified classes, and no class has been certified in this matter. No
9 notice is required to putative class members under Rule 23(e) since the settlement and dismissal
10 of Plaintiff's individual claims does not bind them in any way.
11

12 Accordingly, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff and Defendants agree
13 that the action shall be dismissed in its entirety and with prejudice with respect to the claims
14 alleged by Plaintiff individually against Defendant, and without prejudice as to any claims
15 alleged by the putative, uncertified class against Defendant.
16

17 Plaintiff and Defendant further agree that each party shall bear her or its own costs and
18 attorney fees.
19

20
21 IT IS SO STIPULATED.
22

23 April 12, 2017

24 Respectfully Submitted,

25 **CYNTHIA ZADEL**, individually and on behalf of
all others similarly situated,

26 By: /s/ Patrick H. Peluso
27 One of Plaintiff's Attorneys

28 Steven J. German
Scott B. Seymann

8245 North 85th Way
Scottsdale, Arizona 85258

Steven Woodrow*
Patrick Peluso*
Woodrow & Peluso, LLC
3900 E. Mexico Avenue, Suite 300
Denver, CO 80210
Phone: (720) 213-0675
Email: swoodrow@woodrowpeluso.com
ppeluso@woodrowpeluso.com

*Stefan Coleman
Law Offices of Stefan Coleman, P.A.
201 S. Biscayne Blvd, 28th Floor
Miami, FL 33131
Phone: (877) 333-9427
Law@Stefancoleman.com

** pro hac vice*

Attorneys for Plaintiff

**GLOBAL RECEIVABLES SOLUTIONS, INC.,
AND ALORICA, INC.,**

By: /s/ Spencer Schulz
Damian Richard – State Bar No. 028477
Bryan Shartle – La. Bar. No. 27640
Spencer Schulz – La. Bar No. 33361
SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.
1545 Hotel Circle South, Suite 150
San Diego, CA 92108-3426
Tel: 619/758-1891
Fax: 619/296-2013

Attorneys for Defendants